

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In re: LTL MANAGEMENT, LLC, <sup>1</sup>  Debtor.	Chapter 11  Case No.: 23-12825 (MBK)  Honorable Michael B. Kaplan

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**NOTICE OF CROSS-MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS FOR ENTRY OF AN ORDER (I) TEMPORARILY SUSPENDING THE DEBTOR'S CHAPTER 11 CASE PURSUANT TO 11 U.S.C. §§ 105 AND 305, AND (II) GRANTING RELATED RELIEF**

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**PLEASE TAKE NOTICE** that the Official Committee of Talc Claimants (the “TCC” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “LTL”), by and through its proposed counsel, will cross-move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, to *Debtor’s Motion for an Order (I) Scheduling Hearing on Approval of Disclosure Statement; (II) Establishing Disclosure Statement Objection Deadline; and (III) Granting Related Relief* [Dkt. 240] (the “Scheduling Motion”) currently scheduled to be heard on May 16, 2023 at 11:30 a.m. (the “Hearing Date”)

**PLEASE TAKE FURTHER NOTICE** that, in its cross-motion (the “Cross-Motion”), the Committee seeks entry of an Order, substantially in the form submitted herewith, pursuant to sections 105(a) and 305(a)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Federal Rule of Bankruptcy Procedure 1017, and the Court’s inherent powers to control its docket, (a) suspending the chapter 11 case in its entirety other than (i) permitting the prosecution of the TCC’s *Motion to Dismiss* [Dkt. No. 286] to a final, non-appealable order, (ii) permitting the prosecution of the TCC’s motion for derivative standing to file a complaint directed at bringing certain estate causes of action and, if granted by the Court, permitting prosecution of that complaint; (iii) allowing for the continued compliance with the Court’s direction to reevaluate the preliminary injunction entered in the adversary proceeding styled as *LTL Management LLC v. Those Parties Listed on Appendix A to the Complaint et al.*,

Adv. Pro. No. 23-010902 (MBK); and (iv) allowing for the continued compliance with the “first day orders” and certain other administrative, reporting, and other matters, including for the avoidance of doubt, all matters related to the retention and reimbursement of estate and statutory committee professionals, to the extent necessary (hereinafter, the “Suspension”); and (b) granting related relief.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with D.N.J. LBR 9013-2(a)(3), opposition to the Cross-Motion, if any, must be filed and served so as to be received not later than four (4) days before the Hearing Date (that is, May 12, 2023). Filings should be in accordance with the Bankruptcy Court’s *General Order re Electronic Means for Filing, Signing, and Verification of Documents*, dated March 27, 2002,<sup>2</sup> as amended, and the *Local Rules* of the Bankruptcy Court, effective August 1, 2021,<sup>3</sup> or with the Clerk of the United States Bankruptcy Court at 402 East State Street, Trenton, New Jersey 08608. Service should be upon Genova Burns, LLC, Attn: Daniel M. Stolz, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey 07102.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: May 4, 2023

**GENOVA BURNS LLC**

By: /s/ Daniel M. Stolz

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*Proposed Local Counsel for the Official  
Committee of Talc Claimants*

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<sup>2</sup> Available at [www.njb.uscourts.gov/sites/default/files/general-ordes/08\\_genOrd\\_eleFilPro.pdf](http://www.njb.uscourts.gov/sites/default/files/general-ordes/08_genOrd_eleFilPro.pdf).

<sup>3</sup> Available at [www.njb.uscourts.gov/sites/default/files/local\\_rules/Local\\_Rules\\_Package\\_08-01-2021\\_final.pdf](http://www.njb.uscourts.gov/sites/default/files/local_rules/Local_Rules_Package_08-01-2021_final.pdf).